

EXHIBIT F

Bonner, Kelly

From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Tuesday, April 27, 2021 6:34 PM
To: Bonner, Kelly
Cc: Goldberg, Seth A.; Priselac, Jessica; Schwartz, Barbara; Hill, Coleen W.; Hansen, Forrest; Adam Slater; lhilton@kanner-law.com; George T. Williamson; Cheryl Calderon; David_Hobbs
Subject: FW: Valsartan, Losartan, and Irbesartan MDL
Attachments: Judges Kugler and Vanaskie ltr re April CMC.pdf; BRIEF in Opposition filed by All Plaintiffs re [1174] MOTION for Protective Order Regarding Plaintiffs' Depositions of Chinese National Witnesses.pdf; Ex. A - hearing041221.pdf

Counsel,

Some of the exhibits to Plaintiffs' letter are subject to your current motion for a protective order. In light of the public interest in the contamination of ZHP's valsartan and its knowledge of the more widespread problem at least a year before the recalls, Plaintiffs challenge the confidentiality of the remaining exhibits as described in their letter.

Best,
Chris

From: Christopher Geddis
Sent: Tuesday, April 27, 2021 2:50 PM
To: Robert Kugler <Judge_Robert_Kugler@nj.uscourts.gov>; tiv_stevenslee.com <tiv@stevenslee.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Karen Friedlander <karen_friedlander@nj.uscourts.gov>; Larry Macstravic <Larry_MacStravic@nj.uscourts.gov>
Cc: Robert Kugler <Judge_Robert_Kugler@nj.uscourts.gov>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Ball, Frederick R. <FRBall@duanemorris.com>; Gallagher, Patrick <PCGallagher@duanemorris.com>; Reeder, Nathan B. <NBReeder@duanemorris.com>; CCT@Pietragallo.com; Lori 'ZZ-Cohen <CohenL@gtlaw.com>; lockardv@gtlaw.com; jgeoppinger@ulmer.com; Sarah.Johnston@btlaw.com; valpec@kirtlandpackard.com; Loretta Smith <Loretta_Smith@nj.uscourts.gov>; Adam Slater <ASlater@mazieslater.com>; valpec@kirtlandpackard.com
Subject: Valsartan, Losartan, and Irbesartan MDL

Dear Judge Kugler and Judge Vanaskie:

Plaintiffs' unredacted letter regarding tomorrow's case management conference is attached to this email. The letter and exhibits are available at the following link:
<https://www.dropbox.com/sh/uoktkil15896vu9/AABSiM7EQu7CH6S-UUM-pjZRa?dl=o>. The version filed on ECF is heavily redacted and does not contain the exhibits due to ZHP's extensive confidentiality designations.

For the Court's convenience, Plaintiffs have also attached their opposition to ZHP's motion for a protective order regarding its depositions to this email. It was filed on ECF yesterday.

Respectfully,
Chris

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